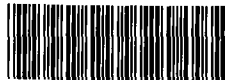


TSD File Inventory Index

US EPA RECORDS CENTER REGION 5



1001759

Date: March 19, 2002

Initial: CMK/ewas

Facility Name: <u>BASF Corporation (Bataavia Facility)</u>		
Facility Identification Number: <u>1LD 095309647</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status <u>A.2</u>	<u>1</u>	.1 Correspondence
.1 Correspondence	<u>Y</u>	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	<u>Y</u>	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	<u>Y</u>	C.2 Compliance/Enforcement <u>C.2</u>
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos
.1 Correspondence <u>A 4.1 - A. 4.2</u>	<u>1</u>	.4 RFA Reports <u>D.1.4</u>
.2 Closure/Post Closure Plans, Certificates, etc <u>See A. 4.1</u>		D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

Total - 5

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	1
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: _____



Environmental Protection Agency

1701 S. First Street Maywood, IL 60153

RECEIVED

MAR 12 1982

312/345-9780

WASTE MANAGEMENT BRANCH
EPA REGION V

Refer to: 08901007 - Kane County - Batavia/Batavia Coatings
ILD095309647

March 8, 1982

Whittaker Corp. - Batavia Coatings
1500 Lathem Street
Batavia, Illinois 60510

Attn: Hank Szymanski

Dear Mr. Szymanski:

On February 2, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of the Batavia Coatings facility. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.15(b) the owner/operator is to establish and maintain inspection records and schedules which detail records of malfunctions, operator errors, discharges, safety and emergency equipment, security devices, and operating and structural devices. Your facility is deficient in that the inspection logs and schedules had been established but not implemented.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that the list of emergency equipment at the facility was not included in the plan.

Requirements contained in 40 CFR 265.53(b) were not complied with in that copies of the contingency plan were not submitted to local emergency response organizations.

Pursuant to 40 CFR 265.73 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.
- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

Your facility is deficient in that items 1, 2, and 5 were not documented in the operating record.

The owner/operator must have a closure plan at the facility. The plan must include a description of how and when the facility will be partially closed, if applicable, and ultimately closed. The plan must address the steps needed to decontaminate facility equipment. Also required is an estimate of the maximum inventory of wastes in storage or treatment on site at any given time and a schedule for final closure including the anticipated date when wastes will no longer be required. The owner/operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. These requirements are pursuant to 40 CFR 265.112. Your facility is deficient in that no closure plan was available at the time of the inspection.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Brad Benning or my staff at the above number.

Sincerely,

Kenneth P. Bechely (mws)

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control

KPB:BPB:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO.

(11) (18)

CO. - L.P.C.

Region #

Date

(20) / / (25)

Letter Sent (Yes or No)

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No () Time: From : m

Ground Water() Surface() Other() To : m

Photos Taken: Yes () No () Interviewed

Inspector

(27)

(29)

Previous Inspection

Previous Correspondence

Site Open: Yes() No()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

(30)

Board Order ()

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

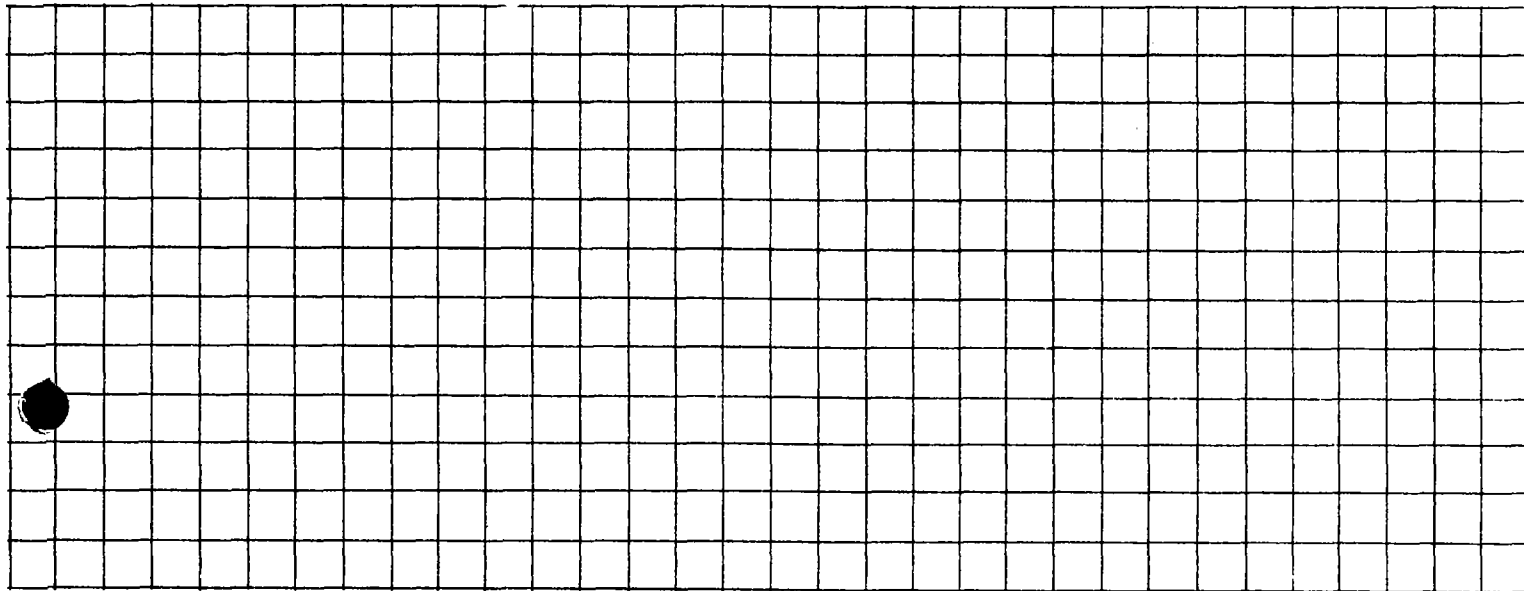
I S or D

(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:



08901007

STATE IDENTIFICATION NUMBER
(If Applicable)

IL0095309647

EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility StandardsI. General Information:

- (A) Facility Name: Whittaker Corp. - Batavia Coatings
- (B) Street: 1500 Lathem St. P.O. Box 428
- (C) City: Batavia (D) State: IL (E) Zip Code: 60510
- (F) Phone: 312/879-6800 (G) County: KANE
- (H) Operator: Whittaker Corp.
- (I) Street: 10880 Wilshire Blvd.
- (J) City: Los Angeles (K) State: CA (L) Zip Code: 90024
- (M) Phone: 213/475-9411 (N) County: _____
- (O) Owner: - Same as operator -
- (P) Street: _____
- (Q) City: _____ (R) State: _____ (S) Zip Code: _____
- (T) Phone: _____ (U) County: _____
- (V) Date of Inspection: 2/2/82 (W) Time of Inspection (From) 9:00 AM (To) 11:30 AM
- (X) Weather Conditions: 20° Snow Cover

(Y) Person(s) Interviewed	Title	Telephone
<u>Hank Szymanski</u>	<u>Manager Rec. + Rec.</u>	<u>312/879-6800</u>
<u>John J. Pelouquin</u>	<u>Corp. Hygienist</u>	<u>"</u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>Brad Benning</u>	<u>IEPA/EPS</u>	<u>312/345-9780</u>
<u>Charles Gruntman</u>	<u>IEPA/EPE</u>	<u>"</u>
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Brad Benning</u>	<u>IEPA/EPS</u>	<u>312/345-9780</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|---|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p>1. Containers (I) ✓</p> <p>2. Tanks (J)</p> <p>3. Surface Impoundments (K)</p> <p>4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)</p> <p>omitted pages 11, 18 21, 23</p> |
|---|---|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	✓	<u>NO HAZ. WASTE accepted</u>
2. Facility expansion?	—	—	✓	<u>NO Expansion</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	_____
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	✓	<u>NO HAZ. WASTE accepted</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	—	✓	—	<u>Alarm system</u>
2. Artificial or natural barrier around facility?	✓	—	—	<u>Fence</u>
3. Controlled entry?	✓	—	—	_____
4. Danger sign(s) at entrance?	✓	—	—	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	<u>Inspection routine</u>
2. Records of operator error?	✓	—	—	<u>is documented</u>
3. Records of discharges?	✓	—	—	<u>but log is</u>

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>not filled out.</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>monthly by outside contractor</u>
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
8. Inspection log?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>outside storage</u>

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

___ ✓ ___

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

✓ ___

pull boxes

Auto-Alarm inside

2. Telephone or 2-way radios at the scene of operations?

✓ ___

Telephones, Paging Syst.

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ ___

Exting., Hoses
absorbant.
SAND, Spill equip.

Indicate the volume of water and/or foam available for fire control:

City WATER - Hydrants

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ ___

In-house inspection
plus outside contract
on alarms - fire eq.

2. Is emergency equipment maintained in operable conditions?

✓ ___

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

✓ ___

flow-meter, pull boxes

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement?

☒ ☐ ☐ ☐

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

☒ ☐ ☐

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

☒ ☐ ☐

*Fire Dept. is familiar with operation.
Company Clinic.*

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

☒ ☐ ☐

NO Address

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

☐ ☒ ☐

*equipment list
NOT documented*

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

☒ ☐ ☐

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>no emergencies</u>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>

*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— ✓ —

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— ✓ —

No formal documentation

c. The location and quantity of each hazardous waste within the facility?

— ✓ —

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — ✓

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ — —

f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — ✓

None Required yet

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓ — —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u> ✓ </u>	<u> </u>	<u> </u>	<u>no documented Plan.</u>
2. Has this plan been submitted to the Regional Administrator	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
3. Has closure begun?	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
4. Is closure estimate available by May 19, 1981?	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	<u> </u>	<u> </u>	<u> ✓ </u>	<u>N/A</u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Whittaker - Batavia Ctg. Date of Inspection: 2-2-82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
2. Are containers compatible with waste in them?	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
3. Are containers stored closed?	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
4. Are containers managed to prevent leaks?	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
5. Are containers inspected weekly for leaks and defects?	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u> ✓ </u>	<u> </u>	<u> </u>	<u>(ignitable)</u>

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	✓	<u>no incompatibles</u>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	✓	<u>''</u>

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	_____
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	_____
5. Are required daily and weekly inspections done?	---	---	---	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	_____

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	—	—
4. Are inspection procedures followed according to 265.403?	—	—	—	—
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	—
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	—	—

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓	—	—	—
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	—	—	—
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	—	—	—

	Yes	No	NI*	Remarks
--	-----	----	-----	---------

3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
--	-------------------------------------	--------------------------	--------------------------	--

4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
--	-------------------------------------	--------------------------	--------------------------	--

5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
--	-------------------------------------	--------------------------	--------------------------	--

6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
---	-------------------------------------	--------------------------	--------------------------	--

7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
----------------------------	-------------------------------------	--------------------------	--------------------------	--

8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------	-------------------------------------	--------------------------	--------------------------	--

(C) Does the owner or operator submit exception reports when needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
--	-------------------------------------	--------------------------	--------------------------	--

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
--	-------------------------------------	--------------------------	--------------------------	--

(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
---	-------------------------------------	--------------------------	--------------------------	--

(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
---	-------------------------------------	--------------------------	--------------------------	--

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>NOT Required yet</i>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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(If answered Yes, complete the following as applicable.)

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|--|
| 1. Exporting Hazardous waste, has a generator: | | | | |
| a. Notified the Administrator in writing? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c. Met the Manifest requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. Importing Hazardous Waste, has the generator: | | | | |
| Met the manifest requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

XI. REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Whittaker - Batavia Coatings, formulates industrial coatings for various companies, such as aluminum siding, paint on soda cans. They generate spent wash solvent and scrap paint. The majority of their waste is reclaimed by American Chemical Service, which will reclaim the solvent and use the bottoms as fuel stock. The wash solvent is mixed with scrap paint to make the mixture

REMARKS: pumpable. The waste is usually pumped from 55 gal drums into a tank truck. Scrap paint sludge may also be landfilled. They currently have a large inventory of waste on-site, which is awaiting reclamation and disposal. The increased volume is a result of taking over other companies inventories. Batavia Coatings will normally generate ~19,000 gal/yr. of solvent and paint waste. The drums are stored outside on an asphalt lot, which is sloped and bermed to contain all spillage on-site. The storage area is enclosed by a cyclone fence. RCRA violations were primarily paperwork deficiencies, no serious environmental problems were observed.